

Record Retention Policy

Reviewed and adopted by the Board of Trustees: 12^{th} of September 2024 Next Review Date \quad Q3 2025

Record Retention Policy

1. Introduction

1.1 This Retention of Records Policy has been approved by the Board of Trustees (the trustees) of Construction Youth Trust. The Trust is registered with the Office of the Information Commissioner with registration number 1094323.

1.2 The Retention of Records Policy will enable the Trust to comply with the requirements of data protection legislation. Furthermore, this policy will enable the Trust to manage and track documents and assist in providing openness and transparency to the public.

1.3 The Retention of Records Policy is required to support the organised creation, retrieval, appropriate storage and preservation of the Trust's essential records. In addition, it is essential to support the appropriate disposal of documents with no continuing business, legal or historical significance.

1.4 As a Trust, the actual period for records to be kept will depend on a number of factors, including:

- Legal requirements
- Storage costs
- The Trust's need to access the document
- Historical value
- Industry standards or best practice.
- Archival needs (permanent preservation).
- Decision by senior management (in the absence of guidance on the above)

2. Scope of the Policy

2.1 This policy encompasses:

All records created by or on behalf of the Trust and staff in their duties for the Trust, records received by any member of staff in the Trust, hard copy and electronic records including Internet and Intranet sites, databases, emails, films and videos.

3. Data Protection

3.1 This policy will ensure that the Trust is complying with applicable data protection legislation, which requires that we do not retain personal data for longer than is necessary.

3.2 To comply with the principles of data protection legislation, the Trust must:

- only keep information for as long as there is a business need
- keep records secure, whether electronic or paper
- ensure records are retrievable and easily traced

• allow a person access to information held about them, should they request it

3.3 It follows that the Trust must:

- destroy papers and electronic data for which there is no continuing business need and send papers that cannot be destroyed to archive for as short a time as possible
- keep data secure while it remains in any office
- keep track of where information is stored
- continue to apply these good practices to avoid stockpiling papers in the future

4. Record Keeping

4.1 Records will be reviewed against the record retention schedule on an annual basis. Records that have passed their retention period and have no current ad-hoc requirement to retain the information (e.g. current or pending legal action or complaint) will be presented to their information asset owner for confirmation that disposal should be undertaken.

4.2 A record will be maintained of this annual disposal documenting, the date range disposed of types of records disposed & the date the disposal took place.

5. Secure Disposal

5.1 All deleted records will be disposed of in a secure manner. In the case of paper records, these will be shredded prior to disposal. In relation to electronic records these will be deleted and the recycle bin emptied or by deleting and reformatting the drive of the computer the file is held on.

APPENDIX 1

RETENTION SCHEDULE

| Data Subject | Type of data | Retention Period |
|-----------------------------|-------------------------|--|
| Employee | All personal data | 7 years following end of |
| | | service |
| | Financial data | 7 years following end of |
| | (salary/pension) | service |
| Construction Youth Trust | All personal data | 7 years following end of |
| Trustee | | appointment |
| Beneficiary | Personal data excluding | 6 years following end of |
| | image | the last programme in |
| | | which they participated |
| | | We will archive and label |
| | Les en en de la | all images as 'not for use' |
| | Image data | after 3 full calendar years |
| | | (i.e. images taken on 1st |
| | | January 2021 and 31st December 2021 will both |
| | | be archived on the 1st |
| | | January 2025) |
| Volunteer/Industry | Personal data | 3 years from date of last |
| Ambassador | | meaningful contact |
| | Email Marketing | Indefinite unless consent |
| | g | withdrawn |
| Charitable Trust / Industry | Personal data | 3 years from date of last |
| partner | | meaningful contact |
| | Email Marketing | Indefinite unless consent |
| | | withdrawn |
| Unsuccessful job applicant | All records | 6 months following |
| | | completion of application |
| | | process. |